

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

REX AND ROBERTA LING LIVING
TRUST u/a DECEMBER 6, 1990, as
AMENDED, JOHN TAYLOR JONES, and
DAVID THOMAS JONES, Individually and
on Behalf of All Others Similarly Situated,

Plaintiffs,

-against-

B COMMUNICATIONS LTD., EUROCOM
COMMUNICATIONS LTD., SHAUL
ELOVITCH, and OR ELOVITCH,

Defendants.

Case No. 1:17-cv-04937 (JPO)

ECF CASE

**LEAD PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Pursuant to Fed. R. Civ. P. 23(e), Plaintiffs Rex and Roberta Ling Living Trust u/a December 6, 1990, as Amended, John Taylor Jones, and David Thomas Jones (together, "Lead Plaintiffs"), individually and on behalf of all Class Members, hereby move this Court for an order: (i) granting preliminary approval of the proposed Settlement; (ii) granting conditional certification of the Class, certifying Lead Plaintiffs as class representatives, and appointing Lead Counsel as class counsel for purposes of the Settlement; (iii) granting approval of the form and manner of giving notice of the proposed Settlement to the Class Members; and (iv) setting a date for a Settlement Hearing and deadlines for the mailing and publication of the Notice, the filing of Class Member objections, the filing of Class Member opt-out notices, the filing of Lead

Plaintiffs' motion for final approval of the Settlement, and the filing of Lead Counsel's application for attorneys' fees and expenses.

This motion is based upon the accompanying Memorandum of Law, the Declaration of Jeremy A. Lieberman and the exhibits thereto, which are filed contemporaneously herewith, and other such matters and argument as the Court may consider at the hearing on this motion.

Significantly, Defendant B Communications Ltd., the only remaining defendant who has appeared in this action, does not oppose the relief sought by this motion.

Dated: March 3, 2020

Respectfully submitted,

POMERANTZ LLP

By: /s/ Jeremy A. Lieberman

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CERTIFICATE OF SERVICE

I hereby certify that on this, the 3rd day of March, 2020, a true and correct copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Jeremy A. Lieberman
Jeremy A. Lieberman